

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>IN RE:</b>	§	<b>CHAPTER 11</b>
	§	
<b>LUCA INTERNATIONAL GROUP LLC<sup>1</sup></b>	§	<b>CASE NO. 15-34221-H2-11</b>
	§	
<b>Debtors.</b>	§	<b>JOINTLY ADMINISTERED</b>

**LIQUIDATING TRUSTEE RANDY WILLIAMS' PAGE /LINE DESIGNATIONS FOR  
DEPOSITION OF JOHN CHU DATED JULY 12, 2017, FOR PURPOSES OF TRIAL --  
Copy Attached as Appendix # 1**

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<sup>1</sup> The Debtors in these cases, along with the last four digits of their respective taxpayer ID numbers, are Luca International Group LLC (1086), Luca International Group (Texas) LLC (5577), Luca Operation, LLC (0343), Luca Barnett Shale Joint Venture, LLC (5340), Luca Energy Fund LLC (0677), Luca Energy Resources, LLC (3896), Luca Resources Group, LLC (1699), Luca I, LP (4104), Luca II, LP, (9778), Luca Oil, LLC (8161), Luca To-Kalon Energy LLC (3922), Luca Oil II Joint Venture (6604).

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I hereby certify that on July 17, 2017, a true and correct copy of the foregoing Line and Page Designation of John Chu's Deposition was forwarded via the Court's ECF notification system to the parties listed below.

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JOHN CHU  
LUCA INTERNATIONAL GROUP, LLC

July 12, 2017

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IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

In Re: Chapter 11  
LUCA INTERNATIONAL GROUP Case No. 15-34221-H2-11  
LLC, et al., Jointly Administered  
Debtors.  
~~~~~ /

DEPOSITION OF  
JOHN CHU

July 12, 2017  
9:08 a.m.

25 Kearny Street, Suite 302  
San Francisco, California

**APPENDIX #1**

Reporter: Diane M. Winter, RMR, CRR, CSR 3186

JOHN CHU  
LUCA INTERNATIONAL GROUP, LLC

July 12, 2017

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DEPOSITION OF JOHN CHU

July 12, 2017

\* \* \*

JOHN CHU,

called as a witness herein and who, being first duly sworn, was examined and testified as follows:

EXAMINATION BY MS. SCOTT

Q. Please state your name for the record.

A. John Chu.

Q. Mr. Chu, I am Brendetta Scott. I represent the liquidating trustee in the Southern District of Texas, the Houston Division, when it comes to a bankruptcy, it is the Luca International Group LLC, et al.

MR. JONES: I'm sorry, but I can't hear.

MS. SCOTT: I was introducing myself.

I am Brendetta Scott representing the liquidating trustee, Randy Williams, who is the trustee over the bankruptcy estate in the Southern District of Texas, Houston Division.

THE REPORTER: Are you still there?

(Off the record from 9:07 to 9:07.)

MS. SCOTT: Can you hear me now?

Q. (BY MS. SCOTT) I was introducing myself.

I am Brendetta --

JOHN CHU  
LUCA INTERNATIONAL GROUP, LLC

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1 A. Since 1982.

2 Q. And where are you employed?

3 A. I'm a partner with the Law Firm of  
4 Corporate Counsel Law Group LLP in San Francisco.

5 Q. And how long have you been at that firm?

6 A. To the best of my recollection since 1990.

7 Q. Okay. And you represent Ms. Bingqing Yang?

8 A. Yes, I do.

9 Q. And she's also known as Joyce, I believe;  
10 is that correct?

11 A. Yes, I believe she uses that American name.

12 Q. And she also goes by Bing?

13 A. Yes.

14 Q. Are there any other names that she goes by  
15 that you are aware of?

16 A. Not that I know of.

17 Q. And Ms. Yang is currently in China; is that  
18 correct?

19 A. She is.

20 Q. And she's there due to health reasons or  
21 issues, is that my understanding -- is that the correct  
22 understanding?

23 A. It's sort of a long story. It's health  
24 reasons now. Originally she went on a quest to procure  
25 working capital for Luca. But that was two years ago

JOHN CHU  
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1 now, I think.

2 Q. And she's been there ever since?

3 A. Yes, she has.

4 Q. Her address here in the United States is  
5 2822 Driscoll Road, Fremont, California; is that  
6 correct?

7 A. Yes. It still is her primary residence.  
8 Her mother is still living there. Her sister is still  
9 living there. So yes, that's sort of their family home  
10 here.

11 MS. SCOTT: Okay. So let's get to my first  
12 exhibit here.

13 (Deposition Exhibit 1 was  
14 marked for identification.)

15 Q. (BY MS. SCOTT) What I've just handed you  
16 is the amended notice which includes the subpoena that  
17 you were served with to appear here today. And you did  
18 agree to appear voluntarily; is that correct?

19 A. Yes, I did.

20 Q. And is this subpoena the subpoena that you  
21 are voluntarily appearing for here today?

22 A. Yes, it is.

23 Q. That subpoena also required you to produce  
24 documents. And I did receive an email yesterday  
25 evening regarding documents that are in response to the

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1 subpoena; is that correct?

2 A. Yes. I emailed everyone yesterday.

3 Q. Do you have any other documents in your  
4 custody, control, or possession that are relevant to  
5 that subpoena that you have not provided to me?

6 A. Not that I'm aware of.

7 Q. And if you become aware of any would you  
8 provide those documents to me immediately, please?

9 A. Yes.

10 MS. SCOTT: Okay. So I'm trying to make  
11 sure that we flow easily with the exhibits. So do we  
12 need to just work --

13 (Off the record from 9:12 to 9:13.)

14 MS. SCOTT: All right. Here's the next  
15 exhibit. This is the stipulated judgment. Pass that  
16 to you.

17 (Deposition Exhibit 2 was  
18 marked for identification.)

19 Q. (BY MS. SCOTT) Is this the stipulated  
20 judgment that was obtained by Ms. You against Ms. Yang?

21 MR. YUN: And what number is this, just for  
22 the record?

23 MS. SCOTT: Two, Exhibit 2.

24 MR. YUN: Okay. Thank you.

25 THE WITNESS: Yes, I've seen this before



JOHN CHU  
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1 reflect "road."

2 A. I'm pretty sure it's "drive."

3 Q. All right. Either way --

4 A. Yes.

5 Q. -- it's the property that was the subject  
6 of this proceeding; is that correct?

7 A. Yes.

8 MS. SCOTT: I think we're at Exhibit 9 at  
9 this point.

10 (Deposition Exhibit 9 was  
11 marked for identification.)

12 Q. (BY MS. SCOTT) All right. What I'm  
13 handing to you now as Exhibit 9, which is an order  
14 dated March 22nd of 2016; is that correct?

15 A. Yes.

16 Q. And this is in case number HG15785974 in  
17 the Superior Court of the State of California, County  
18 of Alameda; is that correct?

19 A. Yes.

20 Q. Same proceeding, Ms. You versus Ms. Yang?

21 A. Same proceeding, yes.

22 Q. You also appeared for that particular  
23 proceeding as well?

24 A. Yes, I did. And I should add, this  
25 particular proceeding in Alameda County was an action

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1 filed by Ms. You for the enforcement of her LA County  
2 judgment that was a prior exhibit. This is an  
3 enforcement proceeding.

4 Q. Correct. And you are referring to the  
5 stipulated judgment that was also secured by an  
6 abstract of judgment?

7 A. Yes.

8 Q. Okay. And this order that we are looking  
9 at, this is Exhibit No. 9, you have reviewed this order  
10 and approved it as to form as counsel for Ms. Yang; is  
11 that correct?

12 A. Yes, I did. Although there is no signature  
13 there to that effect, I did review the order before it  
14 was submitted.

15 Q. Yes. And this order is in effect signed by  
16 a judge of the Superior Court, Grillo, I believe; is  
17 that correct?

18 A. Yes.

19 Q. It is reflected on Exhibit 9, correct?

20 A. Yes.

21 Q. On page 2 of that order, one, two, three,  
22 third paragraph, second line there is language in the  
23 order that states, "In both parties' papers and at a  
24 hearing, the parties agreed that the real property is  
25 subject to liens and encumbrances senior to judgment

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1 creditor's abstract of judgment recorded on July 6th,  
2 2015, at a homestead exemption, as follows:", and then  
3 it goes on to list "a. A first deed of trust recorded  
4 on August 22nd, 2008 by CitiMortgage, Inc. for  
5 \$417,000; A second deed of trust recorded on March  
6 20th, 2015, by Polycomp Trust Company for \$650,000;  
7 c. A homestead exemption by judgment debtor Bingqing  
8 Yang of \$100,000."

9 Did I read that correctly?

10 A. Yes, you did. And I see that the order  
11 says "Driscoll Road," so maybe my memory is incorrect.  
12 Maybe it is Driscoll Road, not Driscoll Drive.

13 Q. Yes. Thank you for that clarification.

14 So the court therefore found that senior  
15 liens and encumbrances, plus the homestead exemption  
16 totals \$1,167,000; is that correct?

17 A. Yes.

18 MR. JONES: Objection, form.

19 Q. (BY MS. SCOTT) And the court also found in  
20 this order that the fair market value of real property,  
21 being the Driscoll property, to be \$1,556,000?

22 A. Yes.

23 MS. SCOTT: We are now on Exhibit 10.

24 (Deposition Exhibit 10 was  
25 marked for identification.)

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LUCA INTERNATIONAL GROUP, LLC

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1 Q. (BY MS. SCOTT) Mr. Chu, is this the  
2 response that you filed in that proceeding under case  
3 number HG15785974 for Ms. Yang?

4 A. Yes, it is.

5 Q. And this was filed on April 11th, 2016; is  
6 that correct?

7 A. Yes, correct.

8 Q. On page 2 under paragraph 2 it discussed a  
9 second lien held by Polycomp Trust; is that correct?

10 A. Yes.

11 Q. \$650,000, the original balance for that  
12 loan, correct?

13 A. Correct.

14 Q. And it also goes on to say that Polycomp is  
15 now approximately owed about \$25,000; is that correct?

16 A. Yes. That -- that -- that was based on my  
17 understanding at the time, yes.

18 Q. And that was back on April 7th of 2016,  
19 around that time?

20 A. Yes.

21 MS. SCOTT: Okay. We're now on Exhibit 11.

22 (Deposition Exhibit 11 was  
23 marked for identification.)

24 Q. (BY MS. SCOTT) This is an order granting  
25 the sale of dwelling filed in Alameda County on May

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1 23rd of 2016; is that correct?

2 A. Yes.

3 Q. In the Superior Court of the State of  
4 California, County of Alameda, correct?

5 A. Correct, yes.

6 Q. Case number HG15785974, correct?

7 A. Correct.

8 Q. This is the Ms. You against Ms. Yang  
9 proceeding, right?

10 A. Yes.

11 Q. You actually appeared in that proceeding as  
12 well, correct? Let's see, one, two, three, fourth  
13 line.

14 A. I did appear, yes.

15 Q. Okay. States "Judgment debtor appeared by  
16 counsel, John Chu."

17 All right. Turn to page 2, if you will,  
18 please.

19 MR. JONES: Can you tell me the date of  
20 that exhibit again. I'm sorry.

21 MS. SCOTT: Let's see, it was signed May  
22 23rd, 2016.

23 MR. JONES: Thank you. Sorry to interject.

24 MS. SCOTT: No problem.

25 Q. (BY MS. SCOTT) Okay. Under No. 1 of

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1 page 2 it states that there are -- "The liens and  
2 encumbrances recorded against the real property owned  
3 by judgment debtor located at and commonly known as  
4 2822 Driscoll Road, Fremont, California, 94539 ('real  
5 property') that are senior to judgment creditor's  
6 abstract of judgment recorded on July 6th, 2015, are  
7 attached herein as Exhibit 1, the litigation guarantee,  
8 and are as follows."

9 Did I read that portion correctly?

10 A. Yes.

11 Q. And then it goes on to list the first deed  
12 of trust recorded by CitiMortgage for \$417,000 on  
13 August 22nd, 2008; second lien for Polycomp for  
14 \$650,000, dated March 20th, 2015; Ms. Yang's homestead  
15 exemption of \$100,000; and it again gives that total  
16 number of liens, senior liens and encumbrances in the  
17 homestead of \$1,167,000; is that correct?

18 A. Yes.

19 Q. And the court again found that based on  
20 uncontroverted declaration of Mr. Yang, Jason Yang, who  
21 I believe was counsel for Ms. You in this proceeding,  
22 correct?

23 A. Yes.

24 Q. Again the court also found, based on the  
25 uncontroverted declaration of Jason Yang, counsel for

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1 Ms. You at that time, correct?

2 A. Yes. Counsel for Ms. You at that time.

3 Q. Ms. You, yes. The court found the fair  
4 market value of the real property was \$1,556,187.96; is  
5 that correct?

6 A. Yes.

7 Q. And the court granted the judgment  
8 creditor, Ms. You, her application for an order to sell  
9 the real property, correct?

10 A. Correct.

11 Q. Look at paragraph 4 on page 3. Would you  
12 read paragraph 4 for me, please.

13 A. Aloud or to myself?

14 Q. Aloud, please.

15 A. Four, "If the real property is sold, then  
16 the distribution of the proceeds from the sale of the  
17 real property shall be distributed in the following  
18 order:

19 Subparagraph (a), "First, to discharge the  
20 amounts owed on the senior liens and encumbrances on  
21 the real property by CitiMortgage, Inc. and Polycomp  
22 Trust Company (not including any prepayment  
23 penalties)."

24 Subparagraph (b), "Second, to judgment  
25 debtor in the amount of the homestead exemption for

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1 Q. (BY MS. SCOTT) Okay. What I've just  
2 handed you is a notice which also includes an  
3 application filed on behalf of Ms. Meiyu You; is that  
4 correct?

5 A. Yes.

6 Q. And that is dated February 28th, 2017?

7 A. Yes.

8 Q. Filed in Alameda County, in the Superior  
9 Court of California; is that correct?

10 A. Yes.

11 Q. Proceeding, Ms. You against Ms. Yang, case  
12 number HG15785974; is that correct?

13 A. Yes.

14 Q. Flip over with me to page -- there aren't  
15 any page numbers. One, two, three, fourth page. Are  
16 you there?

17 A. Yes.

18 Q. Start reading for me at line 9, where it  
19 starts "Eventually."

20 A. "Eventually, a settlement was reached  
21 between You and Luca International Group, LLC. You  
22 agreed that the \$120,000 from the sale proceeds of the  
23 real property would be paid to the account of Luca  
24 International Group, LLC or the bankruptcy litigation  
25 trustee's subrogation rights to the second trust deed



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1 holder."

2 Shall I continue?

3 Q. Yes, please.

4 A. "To the extent that Luca International  
5 Group, LLC had any further claims from its subrogation  
6 rights" --

7 Q. For any claims -- any claims for -- start  
8 at "To the extent," please.

9 A. "To the extent that Luca International  
10 Group, LLC had any further claims from its subrogation  
11 rights to the second trust deed holder, then those  
12 claims would be subordinate to You's claims."

13 Then there is a citation to the declaration  
14 of Yang, paragraph 9.

15 Q. Yes, that's fine. So in that portion you  
16 just read, You refers to Ms. Meiyu You, correct?

17 A. Yes.

18 MR. JONES: Objection, form.

19 Q. (BY MS. SCOTT) Being the party who agreed  
20 to pay the \$120,000; is that correct?

21 A. Yes.

22 Q. And the --

23 MR. JONES: Objection to form.

24 Q. (BY MS. SCOTT) And the second trust deed  
25 holder is Polycomp; is that correct?

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1 A. Correct.

2 Q. Okay. Go two pages over from that page, on  
3 line 6. Are you there?

4 A. Yes.

5 Q. Okay. It shows that there is a first deed  
6 of trust -- well, let's see. "As of the date of this  
7 motion, the balances owed on the real property are as  
8 follows." Let's see, "First deed of trust \$237,719.06  
9 (through January 31st, 2017)." Then "Second trust  
10 deed" 400 -- I'm sorry, "\$42,855.28 (through January  
11 31st of 2017)." The "Homestead exemption \$100,000."  
12 And then it shows "Luca International LLC settlement  
13 \$120,000. Total senior lienholders" 574,000 -- I'm  
14 sorry, "\$500,574.34;" is that correct?

15 A. Yes.

16 Q. And the real property being referred to is  
17 the Driscoll Road property that we've been discussing  
18 here today; is that correct?

19 A. Correct.

20 Q. Also this portion reflects shares on  
21 advanced fees to be determined, correct?

22 A. Yes.

23 Q. "You's judgment \$425,000; You's interest on  
24 judgment \$71,261.28, (June 1st, 2015 through February  
25 2nd, 2017);" is that correct?

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1 Q. Isn't it true that she states that her  
2 opinion as owner of the property that the fair market  
3 value of the property is at least \$1.668 million?

4 A. 1.668 million, yes.

5 Q. And Ms. Yang in fact signed this  
6 declaration on April 7th, 2017; is that correct?

7 A. That's correct.

8 Q. So as you stated, this summary of  
9 opposition was filed in response to a motion that  
10 Ms. You filed seeking approval of a writ of execution  
11 sale bid, correct?

12 A. Yes.

13 Q. And the proposed bid that Ms. You wanted to  
14 pay was partially a cash bid and partially a credit  
15 bid; is that correct?

16 A. Correct.

17 Q. The partial cash was \$742,000?

18 A. Yes.

19 Q. And the credit bid was \$425,000, correct?

20 A. Yes, correct.

21 Q. And that would have brought her total  
22 proposed bid to the \$1,167,000?

23 A. Correct.

24 Q. So the credit bid was based upon her  
25 abstract of judgment, correct?

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1 A. Correct.

2 MS. SCOTT: Let's see. The next exhibit  
3 I'm going to hand you is -- let's see, what number are  
4 we on now?

5 THE WITNESS: That was 13, so the next one  
6 is 14.

7 MS. SCOTT: 14.

8 (Deposition Exhibit 14 was  
9 marked for identification.)

10 Q. (BY MS. SCOTT) Now there was a hearing on  
11 this particular motion on April 13th, correct? Well,  
12 let me make it easier for you.

13 A. I'm not sure if the hearing actually took  
14 place on the 13th or whether it was continued for a  
15 week after.

16 Q. Okay. All right. I'm handing you Exhibit  
17 14, which is an order granting the sale of a dwelling,  
18 at least that is what it's titled. Well, motion for  
19 order for sale of dwelling granted; is that correct?

20 A. Yes.

21 Q. And it's dated April 13th, 2017, correct?

22 A. Yes, correct.

23 Q. And it is an order signed by the court,  
24 correct?

25 A. Yes.

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1 Q. Case number HG15785974, Ms. You versus  
2 Ms. Yang, correct?

3 A. Correct.

4 Q. Again in the Superior Court of California,  
5 County of Alameda.

6 A. Yes.

7 Q. Okay. So this order is pretty plain and  
8 simple. Basically states what we've discussed here  
9 today. Will you start at "The motion," read that  
10 portion for me.

11 A. The part where it says "It is hereby  
12 ordered" or --

13 Q. No, start at "The motion."

14 A. Start at "The" -- oh, okay.

15 Q. At the top.

16 A. "The motion for order for sale of dwelling  
17 filed for Meiyu You was set for hearing on April 13th,  
18 2017 at 9:00 a.m. in Department 511 before the  
19 Honorable Kimberly E. Colwell," C-O-L-W-E-L-L. "The  
20 tentative ruling was published and was contested.

21 "The matter was argued and submitted, and  
22 good cause appearing, therefore.

23 "It is hereby ordered that:

24 "Judgment creditor Meiyu You aka Meiyu  
25 Shelley You's motion to approve the writ of execution

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1 sale bid is granted.

2 "It is hereby ordered:

3 Subparagraph (1), "That the Alameda County

4 Sheriff shall accept You's bid of \$1,167,000 for the

5 real property located at 2822 Driscoll Road in Fremont,

6 California, 94539.

7 Subparagraph (2), "The Alameda County

8 Sheriff shall process and complete the sale upon

9 receipt of this order and You's payment of \$742,000.

10 "The court has considered judgment debtor

11 Bingqing Yang's late-filed opposition brief in ruling

12 on the motion."

13 Q. Okay. Thank you. So in Ms. You's motion

14 to approve the writ of execution bid, she acknowledged

15 that there was \$120,000 owed to the Luca bankruptcy

16 estate?

17 A. Yes, she did.

18 Q. Now based upon that order isn't it true

19 that there was in fact a sale set for the Sheriff to

20 proceed with foreclosure on the Driscoll property?

21 A. The sale was -- had already taken place in

22 January. But the Sheriff had not yet completed the

23 sale, so the sale was pending.

24 Q. Okay. So the pending portion was simply

25 awaiting to see if the court would approve the --

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1 Ms. You's bid, correct?

2 A. Correct.

3 Q. So in response to that Ms. Yang took out  
4 loans to try to stop this proceeding as far as the  
5 Sheriff proceeding with the foreclosure?

6 A. Yes. Under California law the sale is not  
7 actually complete until the Sheriff issues his deed to  
8 the successful bidder at the sale. So while this sale  
9 was pending, Ms. Yang scrambled to try and find the  
10 funds to pay off Ms. You's judgment. So payment of the  
11 judgment would in fact stop the sale at that point.

12 Q. And when you say "judgment," you are  
13 referring to the abstract of judgment --

14 A. Yes.

15 Q. -- which is based on the stipulated  
16 judgment, correct?

17 A. Correct.

18 (Deposition Exhibit 15 was  
19 marked for identification.)

20 Q. (BY MS. SCOTT) All right. So now I hand  
21 to you Exhibit 15. Okay. What I've handed you is  
22 entitled "Secured Loan Agreement;" is that correct?

23 A. Yes.

24 MR. YUN: Whose name is on this one? I  
25 just want the right one.

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1 MS. SCOTT: I'm sorry?

2 MR. YUN: This is the Wang -- this is Wang,  
3 No. 15?

4 MS. SCOTT: Yes.

5 MR. YUN: Thank you. Okay.

6 Q. (BY MS. SCOTT) This is --

7 MR. JONES: Could you give me the name of  
8 that document?

9 MR. YUN: This is the Wang loan.

10 THE WITNESS: It's entitled "Secured Loan  
11 Agreement" and the lender on this particular agreement  
12 is Xinyu Wang, X-I-N-Y-U.

13 MS. SCOTT: Yeah, I'm getting there. I'm  
14 going to ask all those questions.

15 THE WITNESS: Okay.

16 Q. (BY MS. SCOTT) All right. Who is the  
17 borrower on this secured loan agreement?

18 A. Ms. Yang.

19 Q. Who is the lender?

20 A. Mr. Xinyu Wang, W-A-N-G.

21 Q. What is the amount of the loan?

22 A. \$500,000 in US dollars.

23 Q. And what is the interest rate?

24 A. Five percent per annum.

25 Q. And what is the collateral of the loan?



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1 A. Well, the collat --

2 MR. JONES: Objection.

3 THE WITNESS: -- collateral of the loan is  
4 supposed to be the Driscoll Road property. But  
5 Ms. Yang was aware that --

6 MS. SCOTT: Let me stop you there.  
7 Objection, nonresponsive.

8 Q. (BY MS. SCOTT) So the collateral of the  
9 loan is to -- or the proposed or intended collateral  
10 for the loan is the 2822 Driscoll Road, Fremont,  
11 California, 94539 property, correct?

12 A. Correct.

13 MR. JONES: Objection, form.

14 Q. (BY MS. SCOTT) Let's see, now there is a  
15 portion under here that says, "Part A agree to have the  
16 following real property as the collateral and make the  
17 deed of trust record within 120 days start from the day  
18 of the reception of the loan," correct?

19 A. Yes.

20 Q. And the date on this loan is April 18th,  
21 2017, correct?

22 A. Correct.

23 Q. And it's signed by Ms. Yang, correct?

24 A. Yes.

25 Q. Also appears to be signed by --

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1 MR. JONES: Objection, form.

2 Q. (BY MS. SCOTT) Also signed by Ms. -- I'm  
3 sorry, by the lender, correct?

4 A. Correct.

5 MR. JONES: Objection, form.

6 Q. (BY MS. SCOTT) Loan document also states  
7 on page 2, "Part B understands that the local court  
8 need approve this collateral," correct?

9 A. Yes.

10 Q. And Ms. Yang's intent is that the Driscoll  
11 property secures this loan, correct?

12 A. Yes.

13 MR. JONES: Objection, form.

14 Q. (BY MS. SCOTT) And it is the lender's  
15 understanding that the Driscoll property is intended to  
16 secure this loan, correct?

17 A. Correct.

18 MR. JONES: Objection, form.

19 Q. (BY MS. SCOTT) Do you have any  
20 communications with this lender?

21 A. No, I have not.

22 Q. Do you have any contact information for  
23 this lender?

24 A. No, I do not.

25 Q. Would you be able to obtain any contact

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1 information for this lender?

2 A. Yes, I could.

3 Q. And would you provide that information to  
4 me, please?

5 A. Yes.

6 MS. SCOTT: I believe we're on Exhibit 16.

7 (Deposition Exhibit 16 was

8 marked for identification.)

9 Q. (BY MS. SCOTT) What I've handed you is a  
10 document entitled "Secured Loan Agreement," correct?

11 A. Yes.

12 Q. Who is the borrower on that document?

13 A. Ms. Yang.

14 Q. Who is the lender?

15 A. A Mr. Kai Nie, K-A-I, N as in Nancy I-E.

16 Q. What is the amount of the loan?

17 A. \$50,000 US.

18 Q. What is the interest rate of the loan?

19 A. Six percent per annum.

20 Q. What is the collateral for the loan, or the  
21 intended collateral for the loan?

22 MR. JONES: Objection to form.

23 THE WITNESS: Intended collateral is 2822  
24 Driscoll Road.

25 Q. (BY MS. SCOTT) And is Driscoll, 2822

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1 Driscoll Road, Fremont, California, property reflected  
2 on this document as collateral?

3 A. Yes.

4 MR. JONES: Objection, form.

5 Q. (BY MS. SCOTT) Does this document also  
6 include language that "Part A agree to have the  
7 following real property as the collateral and make the  
8 deed of trust record within 120 days start from the  
9 first date of the reception of this loan;" is that  
10 correct?

11 A. That's correct.

12 Q. And the property reflected there also is  
13 2822 Driscoll Road, Fremont, California, correct?

14 A. Correct.

15 Q. On the last page of the document it is  
16 executed by Ms. Yang, correct?

17 A. Correct.

18 MR. JONES: Objection, form.

19 Q. (BY MS. SCOTT) Dated April 23rd, 2017?

20 A. Correct.

21 Q. And also executed by the lender on April  
22 23rd, 2017, correct?

23 A. Correct.

24 MR. JONES: Objection, form.

25 Q. (BY MS. SCOTT) Do you have any

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1 THE WITNESS: Yes, as to Exhibit 16 -- as  
2 to Exhibit 15, yes, as to Exhibit 15.

3 Q. (BY MS. SCOTT) So Ms. You (sic) obtained  
4 this loan to pay off Ms. You, correct, the \$500,000  
5 loan?

6 MR. JONES: Objection.

7 THE WITNESS: Yes.

8 MS. SCOTT: Let me go back and restate  
9 that.

10 Q. (BY MR. SCOTT) Ms. Yang obtained this  
11 \$500,000 loan to pay off Ms. You's lien on the  
12 property, the Driscoll property?

13 A. Correct.

14 MR. JONES: Objection, form.

15 (Deposition Exhibit 17 was  
16 marked for identification.)

17 Q. (BY MS. SCOTT) Okay. What I'm handing you  
18 now as Exhibit No. 17, which is an email chain between  
19 you and -- when I say "you," I mean you, Mr. Chu, and  
20 Mr. Jason Yang, Meiyu You's counsel, correct?

21 A. Yes.

22 Q. There was an email that you sent -- Mr. Chu  
23 sent to Jason Yang on Sunday, April 16th, 2017, at  
24 10:15 p.m., correct?

25 A. Correct.

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1 A. This email?

2 Q. Yes.

3 A. Yes, Exhibit 17.

4 MS. SCOTT: Thank you. Next exhibit is  
5 Exhibit 18.

6 (Deposition Exhibit 18 was

7 marked for identification.)

8 Q. (BY MS. SCOTT) Okay. What I've just  
9 handed you is an official check; is that correct?

10 A. It's an official Citibank cashier check,  
11 yes, a copy of it.

12 Q. Yes, what is the amount?

13 A. 504,000 -- pardon me. Let me start over.  
14 \$504,035.94.

15 Q. To whom is it made payable?

16 A. To the Alameda County Sheriff's Office.

17 Q. Who is the remitter?

18 MR. JONES: Objection, form.

19 THE WITNESS: The remitter is Bing Yang --  
20 or it's Corporate Counsel Law Group, LLP.

21 Q. (BY MR. SCOTT) Mr. Chu, who submitted the  
22 check to Alameda County Sheriff's Office?

23 A. I did.

24 Q. On who's behalf?

25 A. On behalf of Bing Yang.

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1 Q. For what purpose?

2 MR. JONES: Object to the form of the  
3 question.

4 THE WITNESS: To pay off Ms. You's judgment  
5 and to remove the judgment lien.

6 Q. (BY MS. SCOTT) And that's your law firm,  
7 right?

8 A. That's my law firm.

9 Q. It also has some writing on here about the  
10 "levy # 15-30010 -- 30010, You versus Yang BC510775;"  
11 is that correct?

12 A. That's correct. I wrote that in there.

13 Q. All right. So this is a check that your  
14 firm -- that you submitted on -- this is a check that  
15 you, Mr. Chu, submitted to the Alameda County Sheriff's  
16 Office, correct?

17 A. I personally handed that check to the  
18 deputy in charge of the execution sale, yes.

19 Q. And the purpose of doing so?

20 A. To pay off the Meiyu judgment and to remove  
21 the judgment lien from the property. Although I'm not  
22 sure Ms. You has removed the lien to date.

23 Q. Have you requested a release?

24 A. I have not.

25 Q. Have you received a release?

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1           A.    I have not. My understanding was that  
2   Ms. You would still be seeking attorney's fees for the  
3   enforcement of the settlement agreement and judgment,  
4   and that she would not be removing the lien until that  
5   issue was resolved.

6           Q.    Attorney's fees in the proceeding here in  
7   California?

8           A.    Yes.

9           Q.    Has she filed any additional documentation  
10   regarding that?

11          A.    No, she has not.

12          Q.    So your firm received the funds from the  
13   \$500,000 loan?

14          A.    Yes, we did.

15          Q.    How?

16          A.    It was wired into one of our operating  
17   accounts. It was supposed to have been wired to our  
18   trust account, but they used the wrong account and it  
19   ended up in an operating account instead. But we -- we  
20   purchased this cashier's check from the operating  
21   account, so we're square.

22          Q.    Okay. Let me make sure I'm clear. The  
23   funds from the \$500,000 loan came to your firm's  
24   account?

25          A.    Correct.



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1 Q. And the firm sent a check, this particular  
2 check, Exhibit 18, to the Sheriff's Office?

3 A. That's correct.

4 Q. Okay. Let's move over to another exhibit.  
5 I believe that will be exhibit No. 19.

6 (Deposition Exhibit 19 was  
7 marked for identification.)

8 Q. (BY MS. SCOTT) So what I've just handed  
9 you is a check from the County of Alameda; is that  
10 correct?

11 A. Yes.

12 Q. What is the date on that check?

13 A. May 11th, 2017.

14 Q. What is the amount of the check?

15 A. \$501,445.87.

16 Q. And to whom is the check made payable?

17 A. The Law Office of -- Law Offices of Bin Li,  
18 PLC.

19 Q. And that is Ms. Meiyu You's counsel,  
20 correct?

21 A. That's correct.

22 Q. At the top there is a reference to a case  
23 number and case name. Would you read that for me,  
24 please.

25 A. "Meiyu You aka Meiyu Shelley You, Bingqing

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1 19 through the break have been struck and we're  
2 starting over at 19.

3 Q. (BY MS. SCOTT) All right. Mr. Chu, you  
4 have Exhibit 19 in front of you. That is a check  
5 issued by the County of Alameda, correct?

6 A. Correct.

7 Q. What's the date on the check?

8 A. May 11th, 2017.

9 Q. What is the amount?

10 A. \$501,445.87.

11 Q. And who is the check payable to?

12 A. Payable to the Order of Law Offices of Bin  
13 Li, PLC.

14 Q. And that's Ms. Meiyu You's counsel,  
15 correct?

16 A. Yes.

17 Q. At the top of that check there is a  
18 reference, Mei You aka Meiyu Shelley You versus  
19 Bingqing Yang, et al., is that correct?

20 A. Yes.

21 Q. Okay. I think we're ready to go over to  
22 Exhibit 20.

23 One other question on Exhibit 19. And  
24 these were funds transmitted from the Sheriff's Office  
25 to Ms. You's counsel, correct?

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1 A. Correct.

2 MR. JONES: Objection, form.

3 Q. (BY MS. SCOTT) Okay. So the next document  
4 is Exhibit 20. Okay. I've already given you that.

5 A. I have it.

6 Q. This is an email from you to me, correct?

7 A. From me to you.

8 Q. From Mr. Chu to me, Brendetta Scott,  
9 correct?

10 A. Correct.

11 Q. It is dated June 30th, 2017, and sent at  
12 11:29 a.m. on a Friday, correct?

13 A. Correct.

14 Q. Look at the second paragraph for me,  
15 please. And would you -- let's see, the second  
16 sentence, will you read that for me, please.

17 A. "Bing was able to borrow money from an old  
18 school classmate at the very last second on an  
19 emergency basis to pay off the judgment thereby  
20 stopping the Sheriff sale."

21 Q. And that is your statement to me in the  
22 email, correct?

23 A. Correct.

24 Q. Second, well, next paragraph, second  
25 sentence, please.

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1           A.     "There was also a \$500,000 wire transfer  
2     into one of our operating accounts of April 17, 2017,  
3     by Xinxu," X-I-N-X-U, "Wang on behalf of Bing, but I  
4     can't find a copy of the actual transmittal."

5           Q.     And that's another statement in your email  
6     to me, correct?

7           A.     Yes.

8           Q.     And in the email you attach several  
9     documents that you were sending to me, correct?

10          A.     Yes.

11          Q.     I think I'm going to come back to that.  
12     I'll come back to that.

13                 All right. The next exhibit I am going to  
14     hand to you is Exhibit 21.

15                     (Deposition Exhibit 21 was  
16                     marked for identification.)

17          Q.     (BY MS. SCOTT) That is Polycomp's note,  
18     correct?

19          A.     Yes, correct.

20          Q.     And it is dated March 12th, 2015; is that  
21     correct?

22          A.     Yes.

23          Q.     What is the amount of that loan?

24          A.     \$650,000.

25          Q.     Interest rate?

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1 A. 10.5 percent.

2 Q. And the maturity date is April 1st, 2020;  
3 is that correct?

4 A. Correct.

5 Q. Looks like the monthly payment of  
6 \$5,945.81; is that correct?

7 A. Yes, correct.

8 Q. Flip over to the back page. Who actually  
9 signed this note as borrower?

10 A. Sheng Liu and Bingqing Yang.

11 Q. Who was the lender?

12 A. The lender was Polycomp. Yes, the lender  
13 is Polycomp Trust Company.

14 Q. And this note was also secured by a deed of  
15 trust; is that correct?

16 A. Correct. Actually by two deeds of trust.

17 MS. SCOTT: Objection to the portion after  
18 I asked you about two deeds of trust.

19 Okay. I believe we are now on Exhibit 22.

20 (Deposition Exhibit 22 was  
21 marked for identification.)

22 Q. (BY MS. SCOTT) All right. What I've  
23 handed you is Polycomp's deed of trust; is that  
24 correct?

25 A. Yes.

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1 Q. What is the date on it?

2 A. March 12th, 2015.

3 Q. And Polycomp is reflected as the lender or  
4 the trustee, correct? No, I'm sorry, reflected as the  
5 lender, correct?

6 A. Correct.

7 Q. And the collateral or property, properties  
8 used to secure that loan, is 3704 Monte Sereno Terrace,  
9 Fremont, California, 94539, correct?

10 A. Correct.

11 Q. And 2822 Driscoll Road Fremont, California,  
12 94539, correct?

13 A. Correct.

14 Q. So both properties were used to secure this  
15 particular loan held by Polycomp, correct?

16 A. Correct.

17 Q. In the amount of \$650,000, correct?

18 A. Correct.

19 Q. And would you go to page 8 of the deed of  
20 trust, please. Who executed this deed of trust as  
21 borrower?

22 A. Sheng Liu and Bingqing Yang.

23 Q. And this deed of trust was in fact recorded  
24 in the official records of Alameda County on March  
25 20th, 2015; is that correct?

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1 A. Correct.

2 (Deposition Exhibit 23 was  
3 marked for identification.)

4 Q. (BY MS. SCOTT) Okay. I am going to hand  
5 you Exhibit 23. So isn't it true that Polycomp's loan  
6 was paid off at a discounted amount?

7 A. Yes.

8 Q. Looking at Exhibit No. 23, looking at the  
9 second page of it for me, please.

10 A. The second page?

11 Q. Yes.

12 A. Yes, uh-huh.

13 Q. You sent Mr. Brian Boren -- well, first of  
14 all, who is Mr. Brian Boren?

15 A. Mr. Brian Boren is the loan officer in  
16 charge of the Polycomp loan account to Bing Yang.

17 Q. Okay. And you have -- this email reflects  
18 correspondence or communication between you and  
19 Mr. Boren, correct?

20 A. Correct.

21 Q. And there appears to be an understanding  
22 that a full satisfaction of the Polycomp debt will be  
23 paid off at \$38,000, correct?

24 A. Correct.

25 Q. Go to the first page. There is an email

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1 from Mr. Boren to you on May 12th, 2017, at 5:17 p.m.,  
2 correct?

3 A. Yes.

4 Q. Would you read that portion for me?

5 A. "Fair enough John. We will accept the  
6 offer. Please be ready to wire Monday. I will send  
7 you an updated demand and we will close this out.

8 Thank you, Brian."

9 Q. And what was your response to him on

10 Monday, May 15th, 2017, 11:29 a.m.? Him being

11 Mr. Boren. Oh, I apologize. There was a an email from  
12 Mr. Boren to you.

13 A. Yes. Brian followed up that email and he  
14 sent me the updated demand. It says, "John, Here is  
15 the updated demand good through tomorrow with the  
16 discount agreed upon. Please let me know once you have  
17 transmitted the funds. Thank you."

18 Q. Okay. And the very last page, which is an  
19 attachment to this email; is that correct?

20 A. Yes.

21 Q. And what is that?

22 A. That is the Polycomp Trust Company FBO Ira  
23 J. Boren letterhead containing the beneficiary payoff  
24 demand on the Polycomp loan.

25 Q. What is the amount?



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1 A. The payoff amount grand total due is  
2 \$38,000.

3 Q. What's the date on that payoff?

4 A. May 15, 2017.

5 Q. And who -- and it also is agreed to and  
6 signed off by Polycomp, correct?

7 A. Correct.

8 Q. And the offer that was accepted or agreed  
9 upon to pay off the Polycomp loan was \$38,000, correct?

10 A. Correct.

11 MS. SCOTT: Okay. And the next exhibit  
12 that I am going to hand you is Exhibit No. 24.

13 (Deposition Exhibit 24 was  
14 marked for identification.)

15 Q. (BY MS. SCOTT) Okay. So this is an email  
16 chain between Mr. Chu and Mr. Boren, correct?

17 A. Correct.

18 MR. JONES: Could you give me the date of  
19 that email so that I can locate it?

20 MS. SCOTT: Yes. This is dated May 15th,  
21 2017. Starts with, "Sorry, I forgot the attachment,  
22 which is now attached." It's one of the documents or  
23 emails that Mr. Chu sent to us yesterday.

24 MR. JONES: Okay. Thank you.

25 MS. SCOTT: Sure.

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1 Q. (BY MS. SCOTT) Mr. Chu, let me just for  
2 clarification on the record, Exhibit No. 23 and Exhibit  
3 No. 24 are documents that you produced to both me and  
4 Mr. Jones pursuant to the subpoena that was issued by  
5 Mr. Randy Williams, correct?

6 A. Correct.

7 Q. Okay. So let's start at May 15th, an email  
8 from Mr. John Chu to Mr. Boren. Let's see, Monday, May  
9 15th, 2017, 2:05 p.m., correct?

10 A. 2:07 p.m.

11 Q. Yes; is that correct?

12 A. Yes.

13 Q. All right. And you are attaching -- this  
14 is an email from you to Mr. Brian Boren. You have  
15 attached the wire confirmation information, correct?

16 A. Correct.

17 Q. Let's take a look at that. It is attached  
18 as well.

19 A. Well, what happened was that I was  
20 following up on Brian's previous email asking for a  
21 copy letting him know once I transmitted the funds.

22 So I emailed him at 2:07 p.m. saying  
23 "Attached is the wire confirmation." But then I  
24 immediately discovered I forgot to attach. And so I  
25 followed up with another email saying, "Sorry, I forgot

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1 the attachment, which is now attached."

2 Q. Yes, yes, yes.

3 A. That's what happened.

4 Q. We've all done that. Okay. So let's look  
5 at the attachment.

6 A. Yes.

7 Q. The wire instruction confirmation,  
8 confirmation number being 20171350400127, correct?

9 A. Yes.

10 Q. \$38,000, correct?

11 A. Correct.

12 Q. To beneficiary Investment Management  
13 Company LLC in Santa Monica, California, correct?

14 A. Yes.

15 Q. This is for settlement of Bing Yang and  
16 Sheng Liu, correct?

17 A. Correct.

18 Q. This was a payment to Polycomp, correct?

19 A. Correct.

20 Q. And this was to have their lien released on  
21 the Driscoll property, correct?

22 A. Correct.

23 MS. SCOTT: Okay. Exhibit No. 25.

24 (Deposition Exhibit 25 was  
25 marked for identification.)

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1 Q. (BY MS. SCOTT) Just for clarification,  
2 Exhibit 25 is a document that was produced pursuant to  
3 the subpoena issued by the liquidating trustee,  
4 correct?

5 A. Correct.

6 Q. Okay. All right. This is an email chain  
7 between Mr. Chu and Mr. Boren dated May 15th, 2015,  
8 2:08 p.m. on a Monday; is that correct?

9 A. Correct.

10 Q. And there is an email from Mr. Boren to  
11 you, and he -- Mr. Boren is requesting signed copies of  
12 the discounted payoff from the borrowers, correct?

13 A. Correct.

14 Q. And did you in fact send those signed  
15 copies to Mr. Boren?

16 A. Yes, I did, on Saturday, May 20th. I did.

17 Q. At 5:08 p.m. pursuant to this email,  
18 correct?

19 A. Yes.

20 Q. Attached in fact are the signature -- the  
21 executed beneficiary demand showing the payoff of  
22 \$38,000, correct?

23 A. Yes.

24 Q. Signed by Ms. Yang and Mr. Liu, correct?

25 A. Yes.

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1 MR. JONES: Objection, form.

2 MS. SCOTT: All right. We're now at  
3 Exhibit 26.

4 (Deposition Exhibit 26 was  
5 marked for identification.)

6 Q. (BY MS. SCOTT) All right. What I've just  
7 handed you is an email from Mr. Allan Sarver to Mr. Chu  
8 dated Monday, May 22nd, 2017, at 10:31 a.m., correct?

9 A. Yes.

10 Q. And Mr. Allan Sarver represents Polycomp,  
11 correct?

12 A. Correct.

13 Q. This Exhibit 26 is another email that you  
14 produced to the liquidating trustee's counsel pursuant  
15 to the subpoena that was issued by the liquidating  
16 trustee's counsel, correct?

17 A. Yes.

18 Q. Attached to that email is a letter dated  
19 May 19th, correct?

20 A. Correct.

21 MS. SCOTT: Can we go off the record real  
22 quick?

23 (Off the record from 10:51 to 10:52.)

24 MS. SCOTT: Back on the record.

25 Q. (BY MS. SCOTT) Okay. Attached to the

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1 email is a letter from Mr. Allan Sarver dated May 19th,  
2 2017, correct?

3 A. Correct.

4 Q. And it is to Mr. Judd, Mr. Rothberg and to  
5 yours truly, Brendetta Scott, correct?

6 A. Correct.

7 Q. Regarding the Luca International Group LLC,  
8 et al. order granting Polycomp's claim of interest in  
9 proceeds, notice pursuant to court order, request for  
10 response, correct?

11 A. Correct.

12 Q. And on the second page of that letter,  
13 second paragraph, Mr. Sarver, who is counsel for  
14 Polycomp, is giving notice to constitute -- strike  
15 that. Mr. Sarver is giving -- is stating that "This  
16 letter shall constitute notice to you as debtors'  
17 counsel in compliance with the aforementioned order,  
18 that my client's note secured by deed of trust has now  
19 been paid in full."

20 Did I read that correctly?

21 A. Yes.

22 MR. JONES: Objection, form.

23 Q. (BY MS. SCOTT) And he's also asking for  
24 reconveyance of the deed of trust upon payment in full.  
25 Or I'm sorry --

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1 MR. JONES: Objection, form. I'm sorry.

2 Q. (BY MS. SCOTT) Let me restate that. Third  
3 paragraph states, "Under California law, my client is  
4 required to reconvey the deed of trust upon payment in  
5 full. Absent objection, my client intends to reconvey  
6 said deed of trust."

7 Did I read that correctly?

8 A. Yes.

9 MR. JONES: Objection, form.

10 Q. (BY MS. SCOTT) So Mr. Sarver is advising  
11 that Polycomp has been paid in full, correct?

12 A. Correct.

13 MR. JONES: Objection, form.

14 Q. (BY MS. SCOTT) And Ms. You -- I'm sorry,  
15 Ms. Yang in fact made that payment to Polycomp,  
16 correct?

17 A. Correct.

18 MR. JONES: Objection, form.

19 Q. (BY MS. SCOTT) And Polycomp's lien was  
20 secured by the Driscoll property, correct?

21 A. Correct.

22 Q. Also attached to Mr. Sarver's letter is an  
23 order granting Polycomp's claim of interest in the  
24 proceeds, correct?

25 A. Yes.

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1 Q. This is an order issued in the bankruptcy  
2 proceeding regarding Luca International Group LLC.  
3 This is document number 545, correct?

4 A. Yes.

5 Q. Look at paragraph No. 5 please on the  
6 second page of that order signed by Judge Jones.

7 A. I see it.

8 Q. This order is signed February 2nd, 2016,  
9 correct?

10 A. Yes.

11 Q. And would you read that fifth paragraph,  
12 No. 5, please.

13 A. "Upon payment in full of the amounts due  
14 under the Polycomp note and the Polycomp deed of trust,  
15 Luca Operation, LLC, and its successor-in-interest, as  
16 representative of all and each of the debtors or their  
17 successors-in-interest, shall be equitably subrogated  
18 to Polycomp's rights under the Polycomp note and the  
19 Polycomp deed of trust in all respects."

20 Q. So the nature of Mr. Sarver's letter was to  
21 notify Polycomp had been paid off, correct?

22 A. Yes.

23 MR. JONES: Objection to form.

24 Q. (BY MS. SCOTT) How was Polycomp paid off?

25 MR. JONES: Objection, form.



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1 THE WITNESS: The payment of Polycomp's  
2 remaining amount owed was through the \$38,000 wire  
3 transfer that I effected on behalf of Ms. Yang.

4 Q. (BY MS. SCOTT) And this payoff was around  
5 May 15th, 2017, correct?

6 A. Yes.

7 MS. SCOTT: I think we're at Exhibit 27.

8 (Deposition Exhibit 27 was  
9 marked for identification.)

10 Q. (BY MS. SCOTT) I'm handing you Exhibit 27.  
11 Okay. What I've just handed you is Exhibit 27, which  
12 is an email, an email chain that is -- that includes  
13 yours truly Brendetta Scott, Mr. John Yun, Ed Rothberg,  
14 Randy Williams, Elizabeth Guffy, Loretta Cross, Alice  
15 Jensen, Sheila O'Callaghan dated June 5th, 2017.  
16 Actually that's where it ends; is that correct?

17 A. Yes.

18 Q. Let's go over to the second page of the  
19 email. Actually I want to go farther back than that.  
20 Let's go to the fourth page of the email. Okay. There  
21 is an email from Mr. Chu that was sent on Tuesday, May  
22 30th, 2017 at 2:27 p.m. You in fact sent that email to  
23 Allan Sarver, correct, Mr. Chu?

24 A. Yes.

25 Q. Would you read that second paragraph.

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1           A.     "On May 15, 2017, pursuant to my client's  
2     discounted pay off agreement with Polycomp Trust  
3     Company FBO Ira J. Boren, my client fully paid  
4     Polycomp's deed of trust against her residence at 2822  
5     Driscoll Drive, Fremont, California."

6           Q.     And that payoff was the \$38,000, correct?

7           A.     Correct.

8           Q.     And you were also requesting a reconveyance  
9     of the deed of trust, correct, from Polycomp?

10          A.     Correct.

11          Q.     Has there been a reconveyance?

12          A.     No, there has not.

13          Q.     During the negotiation or the discussions  
14     of paying off the Polycomp loan was there ever any  
15     notification of the liquidating trustee of the Luca  
16     estate?

17                 MR. JONES:  Objection, form.

18                 THE WITNESS:  You mean did we -- did I --

19                 MS. SCOTT:  Let me reask the question.

20                 THE WITNESS:  Okay.

21          Q.     (BY MS. SCOTT)  Do you know if the  
22     bankruptcy estate was notified of the payoff to  
23     Polycomp?

24          A.     Not until after it happened.

25          Q.     Okay.  And this email that you sent was to

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1 Mr. Sarver and to me, Brendetta Scott, correct?

2 A. Correct.

3 Q. All right. So let's move forward in the  
4 email. Let's go to Monday, June 5th, which would be on  
5 the second page. Are you there?

6 A. Yes, uh-huh.

7 Q. Okay. So this is an email sent by Mr. John  
8 Chu on Monday, June 5th, 2017, at 12:11 a.m. You in  
9 fact sent this email to Mr. John Yun, correct?

10 A. Correct.

11 Q. First, the paragraph numbered No. 1, would  
12 you read the second sentence.

13 A. "The funds used to pay off the remaining  
14 balance owed to Polycomp were borrowed."

15 Q. The second paragraph, paragraph labeled No.  
16 2, would you read that, please?

17 A. The entire second paragraph?

18 Q. Yes, please.

19 A. "No post-asset freeze liens have been  
20 placed on the Driscoll property. To the extent that  
21 Ms. Yang's lenders seek liens on the Driscoll property  
22 to secure their loans, we will seek district court  
23 approval for the liens." Then there is a typo. "I  
24 have asked Ms. Yang to forward the loan documentation  
25 for the motion to be filed."

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1 Q. Has this motion been filed yet?

2 A. No, it has not.

3 Q. When will it be filed?

4 A. Within the next month, I hope. It's one of  
5 these -- it's on the back burner. I've been --

6 Q. But it will be filed?

7 A. It will be filed.

8 Q. And it is Ms. Yang's intent that the  
9 Driscoll property secure those loans, correct?

10 A. Yes.

11 MR. JONES: Objection, form.

12 Q. (BY MS. SCOTT) All right. Let's see, next  
13 paragraph, which is the third paragraph, you state,  
14 "Ms. Yang's replacement loan was necessary for the  
15 preservation of the property."

16 And the last sentence of that says, "The  
17 replacement loan will have lower interest charges and  
18 eliminate the danger of imminent foreclosure."

19 Did I read that correctly?

20 A. That's correct.

21 Q. There was also a 24 percent default  
22 interest rate on the Polycomp deed of trust; is that  
23 correct, or not?

24 A. That's correct. Polycomp was accruing  
25 interest at 24 percent per year. And the bankruptcy

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1 court in Texas had approved of that rate being accrued  
2 to them. So we weren't in a position to challenge  
3 that.

4 Q. So this loan that you are referring to is  
5 the \$500,000 loan?

6 A. No. Oh --

7 Q. The replacement loan?

8 A. The replacement loan for the Polycomp debt  
9 was the \$50,000 loan.

10 Q. Okay. Thank you.

11 MR. JONES: Object to form.

12 Q. (BY MS. SCOTT) And the \$500,000 loan was  
13 for Ms. Meiyu You; correct?

14 A. That was for Ms. You, correct.

15 MR. JONES: Object to form.

16 Q. (BY MS. SCOTT) When I say that loan was  
17 for her, it was used to pay off her -- Ms. Meiyu You's  
18 lien, correct?

19 A. Correct.

20 MR. JONES: Object to form.

21 Q. (BY MS. SCOTT) So it appears that Polycomp  
22 was also paid off around the same time as the Sheriff  
23 sale; is that correct?

24 A. About a month after.

25 MR. JONES: Objection to form.

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1 THE WITNESS: As I recall, yes, correct.

2 Q. (BY MS. SCOTT) Have there been any repairs  
3 done on the Driscoll property recently?

4 A. Repairs, no, there have not.

5 Q. Are there any intended to be made?

6 A. No.

7 MR. JONES: Objection, form.

8 THE WITNESS: The property is in good  
9 condition. There is no need for repairs or anything.

10 MS. SCOTT: This is Exhibit 28.

11 (Deposition Exhibit 28 was  
12 marked for identification.)

13 Q. (BY MS. SCOTT) Okay. What I've just  
14 handed you is an email from Mr. Sarver, Polycomp's  
15 counsel, to Mr. Chu, and Mr. Brian Boren is copied.  
16 The date of the email is Thursday, June 29th, 2017, at  
17 10:27 a.m., correct?

18 A. Correct.

19 Q. And this is essentially an agreement that  
20 the reconveyance that Polycomp -- I'm sorry, that --  
21 let me strike that and start all over.

22 This is an agreement that Mr. Chu -- your  
23 request for the reconveyance of the deed of trust to  
24 Ms. Yang will be stayed; is that correct?

25 A. That's correct.

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1 Q. Okay. I want to go back to Exhibit 20.

2 MR. JONES: Say one more time. I'm sorry.

3 MS. SCOTT: Exhibit 20. We're going back  
4 to Exhibit 20.

5 MR. JONES: Okay.

6 Q. (BY MS. SCOTT) Well, first, I think I've  
7 asked this, I just want to make sure that I did. Has  
8 there been a release from Ms. You?

9 A. No, there has not.

10 Q. Has there been a release from Polycomp?

11 A. No, there has not.

12 Q. But both those loans have been paid,  
13 correct?

14 A. Correct.

15 MR. JONES: Objection, form.

16 Q. (BY MS. SCOTT) Okay. On your -- on  
17 Exhibit 20, this is the email that Mr. John Chu sent to  
18 yours truly, Brendetta Scott, including some documents  
19 that were requested. And included in those documents  
20 appears to be a wire for \$29,980 on April 28th, 2017;  
21 is that correct?

22 Let's take a look at the email from Howard  
23 Chung to Mr. Chu on Tuesday, May 2nd, 2017 at 3:11 p.m.

24 A. Yes.

25 Q. So this starts with you asking if there was

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1 a \$30,000 wire from China; is that correct?

2 A. Correct.

3 Q. And you got a response that there was a  
4 \$29,980 wire from -- is it -- I'm going to let you  
5 pronounce it.

6 A. Lai Chunhui, L-A-I, C-H-U-N-H-U-I.

7 Q. And who is that?

8 A. I believe that's a friend or associate of  
9 Bing Yang. I don't know the person.

10 Q. What was the purpose of these funds?

11 A. The purpose of the \$30,000 wire from China  
12 was to fund the Polycomp payoff.

13 Q. Was this part of the \$50,000 secured loan  
14 agreement?

15 A. Yes.

16 MR. JONES: Objection, form.

17 Q. (BY MS. SCOTT) Next there is a transaction  
18 receipt/funds availability notice.

19 A. Yes.

20 Q. For \$8,000 on May 9th, 2017, from looks  
21 like Citibank. Is this a wire transaction?

22 A. No. This was actually a direct deposit  
23 into the -- into the Citibank trust account.

24 Q. What was the purpose of this \$8,000?

25 A. That was for the payoff of the Polycomp



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1 loan.

2 Q. Was this also part of this \$50,000 secured  
3 loan agreement?

4 A. Yes, it was. It was part of the \$50,000.

5 MR. JONES: Objection to form.

6 MS. SCOTT: Thank you. Okay. So at this  
7 point I will pass the witness for any other questions.

8 MR. JONES: I'm happy to commence. If  
9 anybody needs a break we can take a break first, but  
10 I'm happy to keep going, whatever you guys prefer.

11 MR. YUN: I'm fine.

12 MS. SCOTT: Yeah, I'm fine, we can go on.

13 EXAMINATION BY MR. JONES

14 Q. Okay. My name is Brandon Jones. I  
15 represent Meiyu You, also known as Shelley.

16 Mr. Chu, with regards to -- if you'll get  
17 Exhibit No. 15 in front of you, which is titled  
18 "Secured Loan Agreement" in the amount of \$500,000.

19 A. I have it.

20 Q. Okay. Did you draft this secured loan  
21 agreement?

22 A. No, I did not.

23 Q. Did you negotiate on behalf of Ms. Yang  
24 with regards to this secured loan agreement?

25 A. No, I did not.

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1 Q. (BY MR. JONES) Mr. Chu, is this -- is the  
2 intent behind this loan your intent, Mr. Chu, or  
3 Ms. Yang's intent?

4 A. Both of us, I believe. And the -- there is  
5 ambiguity as to intent. My intent for Bing borrowing  
6 money was to pay off the judgment and judgment lien.  
7 What Bing's intent was in borrowing it, that's --  
8 that's, you know, I can't speak for her, but I presume  
9 that was her intent as well. But that was my intent.

10 Q. Okay. But you did not negotiate with the  
11 person listed as lender on this Exhibit 15, correct?

12 A. No, I did not. I did not -- I've never met  
13 or spoken to this person.

14 Q. Do you know who drafted this secured loan  
15 agreement, Exhibit 15?

16 A. Not specifically. Generally I do know, but  
17 specifically I do not know.

18 Q. What's your general understanding?

19 A. My general understanding is that it was  
20 drafted by an attorney in China.

21 Q. And did you have communications with  
22 counsel in China with regards to this secured loan  
23 agreement?

24 A. No, I did not.

25 Q. Does -- if you'll look at Exhibit 23 -- I'm

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1     sorry, Exhibit 20. For the record I do not have this  
2     exhibit, I haven't received a copy of it. But I'll go  
3     based on your prior testimony. But if you'll get  
4     Exhibit No. 20 in front of you.

5             A.     Yes.

6             Q.     I believe you stated that this is an email  
7     wherein you are explaining a wire in the amount of  
8     \$500,000. Is that generally correct?

9             A.     No. This is my response to Ms. Scott's  
10    email asking -- asking me for certain documents, and  
11    asking me for permission to speak with Ms. Yang. So  
12    this is my response to Ms. Scott where she asked me for  
13    certain documents and I responded.

14            Q.     If you'll look at Exhibit 18, which is the  
15    Citibank check.

16            A.     Yes, I have it.

17            Q.     Was this -- were the funds from this check  
18    drawn out of your firm's trust?

19            A.     No, they were not. They were drawn out of  
20    one of our operating accounts.

21            Q.     And how did the funds -- how were the funds  
22    placed into your operating account to draw this money?

23            A.     \$500,000 of the check was wire transferred  
24    into our operating account a few days before April  
25    21st, 2017.

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1 Q. And do you note who wired the money in your  
2 operating account?

3 A. I'm not sure who the exact remitter is, but  
4 it was Ms. Yang who caused the amounts to be wired.

5 Q. And how do you know that it was Ms. Yang  
6 that caused the amounts to be wired?

7 A. Uh --

8 Q. Is there, is everyone still on?

9 A. Yeah, I'm, I'm --

10 Q. Okay, I'm sorry. I apologize. I don't  
11 have the benefit of --

12 A. No, I'm sorry. I need to formulate my  
13 answer so that I can do it without disclosing  
14 attorney-client communications.

15 Q. Take your time. I apologize. I did not  
16 mean to interrupt.

17 A. And to answer your question, I know that  
18 this \$500,000 was remitted to your account by Ms. Yang,  
19 because there were ongoing communications between  
20 Ms. Yang and myself immediately preceding the wire  
21 relating to the status of that particular wire. So  
22 we -- I was expecting that money from her all during  
23 that time.

24 Q. Okay.

25 A. So to answer your question, I was expecting

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1 theories the lender could assert in that regard. And  
2 the reason I hesitate to speak on it is because I can  
3 envision the lender coming into court and seeking  
4 equitable subrogation rights based on the facts. But  
5 there is no consensual lien available to that lender  
6 for foreclosure.

7 Q. (BY MR. JONES) Okay. Let's change gears  
8 briefly and let's talk about the payoff of the judgment  
9 that Meiyu or Shelley had against Bingqing Yang.  
10 Ms. You called the Sheriff sale on the Driscoll  
11 property, correct?

12 A. She was the one who initiated it, yes.

13 Q. And Shelley bid, but her bid was too low,  
14 correct?

15 A. Yes.

16 Q. And she requested that the court there in  
17 Alameda County accept her lower bid, correct?

18 A. Correct.

19 Q. And the court ended up approving Shelley's  
20 request, correct?

21 A. Correct.

22 Q. And there was an order that's an exhibit in  
23 this deposition that reflects the approval of Shelley's  
24 request for the entry and order allowing her lower bid,  
25 correct?

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1 A. Correct.

2 Q. After the entry of that order you  
3 approached Jason Yang to negotiate a payoff or a  
4 settlement of Shelley's judgment, correct?

5 A. Well, I approached Mr. Yang, but I don't  
6 recall trying to negotiate with him. I just asked him  
7 for his payoff demand.

8 Q. And Mr. Yang provided a response to you,  
9 correct?

10 A. Correct.

11 Q. And that response had a number that was  
12 larger than 504,000 -- strike that.

13 And Mr. Yang's response was an amount in  
14 excess of \$504,035.94, correct?

15 A. Correct.

16 Q. So is it fair to say that you, on behalf of  
17 Ms. Yang, did not accept or take Mr. Jason Yang's --

18 A. Payoff demand.

19 Q. -- amount of payoff?

20 A. Yes.

21 MS. SCOTT: Objection to form.

22 THE WITNESS: We did not -- we did not pay  
23 his payoff demand, correct.

24 Q. (BY MR. JONES) And instead you caused --  
25 you issued a check to the Alameda County Sheriff's

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1 Office, correct?

2 A. Ultimately, yes.

3 Q. And the basis for the amount of that check,  
4 and this is Exhibit No. 18, Deposition Exhibit No. 18,  
5 the basis for the amount of that check is for the  
6 principal and interest under Shelley You's, Meiyu You's  
7 judgment, correct?

8 A. It's actually more than that. It's more  
9 than principal and interest. It also includes --

10 Q. What was it --

11 A. Well, let me explain. Under California law  
12 the judgment creditor obtains a writ of execution. And  
13 the writ of execution has the amount on it as far as  
14 the payment of the judgment. It includes principal, it  
15 includes interest. It also includes a third component,  
16 costs, which also includes attorney's fees.

17 So the only way to obtain the payoff demand  
18 is to get that number from the judgment creditor, or  
19 alternatively you can get that number from the Sheriff.

20 So when I got what I thought was a  
21 ridiculously high and improper payoff demand from  
22 Mr. Yang, I went directly to the Sheriff to get the  
23 Sheriff's number. And 504,000 figure is the number  
24 that I got from the Sheriff.

25 Q. And the payment of this amount -- and the

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1 figure you got from the Sheriff is for the payoff of  
2 the judgment against Ms. Yang, correct?

3 A. Correct.

4 Q. And this check was issued to pay off the  
5 judgment against Ms. Yang, correct?

6 A. Correct.

7 Q. Now Meiyu You still asserts a lien against  
8 the Driscoll Road property for attorney's fees, do you  
9 understand that?

10 A. Yes, yes.

11 Q. To be fair, Ms. Yang would oppose that  
12 lien, correct?

13 A. Correct.

14 Q. So the Driscoll Road property has not been  
15 sold, correct?

16 A. It has not been sold.

17 Q. Ms. Yang still owns it today?

18 A. She does.

19 Q. Now once this payment was made in Exhibit  
20 18 to the Alameda County Sheriff's Office, is it  
21 correct that under California law the Sheriff could not  
22 go forward with the sale of the Driscoll Road property?

23 A. That's correct.

24 Q. And that's pursuant to California statute,  
25 I believe California Code of Procedure 699.020; is that



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1 Yun representing the Securities and Exchange  
2 Commission.

3 EXAMINATION BY MR. YUN

4 Q. As Ms. Yang's counsel, are you generally  
5 familiar with the liens currently against the Driscoll  
6 Road property?

7 A. Yes, I am.

8 Q. Okay. So you've testified just a few  
9 minutes ago that CitiMortgage has a first lien against  
10 the property. Do you know the approximate outstanding  
11 balance of that?

12 A. I think it's approximately 230,000,  
13 240,000, in that ballpark.

14 Q. Okay. And is it current?

15 A. Yes, it's current.

16 Q. Is there a second recorded lien against the  
17 property?

18 A. The Polycomp lien was second.

19 Q. Okay. To your understanding how much is  
20 still owed under that second lien?

21 A. Nothing.

22 Q. Nothing. Okay. And then the third lien,  
23 is that Ms. Shelley You's lien?

24 A. That is Ms. You's judgment, yes, her  
25 judgment lien.

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1 Q. To your understanding, I know this may be a  
2 matter of dispute, but to your understanding how much  
3 is still owed on that lien?

4 A. I -- the only conceivable remaining amount  
5 owed under that lien would be Ms. You's attorney's fees  
6 in enforcement of her settlement agreement. But I  
7 don't know what they are. Mr. Yang had given me a  
8 figure of \$350,000, which seems to me excessive as far  
9 as enforcement of a judgment. But right now I can only  
10 speculate as to what they are claiming. So I have no  
11 idea.

12 Q. Okay. So would it be fair to say that your  
13 understanding is that to the extent Ms. You is still  
14 owed any money on the third lien it would be some  
15 disputed amount for attorney's fees?

16 A. If at all.

17 Q. If at all?

18 A. She may not be entitled to attorney's fees  
19 at all because I had not seen the stipulated judgment  
20 for a long time. But in just reviewing it today, I  
21 just happened to look for an attorneys fee provision in  
22 the stipulated judgment and I didn't see one.

23 Q. Okay. Fine.

24 A. So it may well be that she's not entitled  
25 to any fees.

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1           A.     It's -- this was -- this is money that he  
2     lent previously. And that money has either been used  
3     by Ms. Yang to live on or to reinvest into the Luca  
4     businesses.

5           Q.     Okay. Are any -- is any of that money  
6     transfers that were made between Ms. Yang and Skyastar?

7           A.     Possibly.

8           Q.     Any other liens that you are aware of?

9           A.     No, that would be it.

10          Q.     So with respect to the \$500,000 loan amount

11     from Mr. Wang in April of this year, you say that money

12     came into your firm's operating account by accident.

13     It should have gone to the attorney trust account?

14          A.     Correct.

15          Q.     Putting that aside, from what institution

16     did your firm's bank receive the money?

17          A.     I believe it was Bank of China.

18          Q.     Bank of China. Do you know if they were a

19     correspondent, or were they actual account holders that

20     transferred the money in?

21          A.     I don't know.

22          Q.     Do you know the name of the account holder  
23     at Bank of China that transferred the money in?

24          A.     I do not know.

25          Q.     How about the -- but there is a record

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1 somewhere?

2 A. There is a record somewhere.

3 Q. And how about the \$50,000 that Mr. Nie lent  
4 to Ms. Yang in April of this year. How did your firm  
5 receive that money?

6 A. My firm received it through the \$30,000  
7 wire transfer.

8 Q. Right.

9 A. And the \$8,000 direct deposit into our  
10 trust account. And there was an additional \$7,000  
11 deposit that was, I believe, direct deposited into  
12 our -- into either one of our operating accounts or to  
13 the trust account. I can't remember off the top of my  
14 head.

15 Q. And what institution made the \$30,000 wire  
16 transfer to your firm?

17 A. I believe it was Bank of China.

18 Q. Bank of China?

19 A. It was an overseas bank. That much I know.

20 Q. That was in one of the exhibits?

21 A. I think so.

22 Q. And the \$8,000 direct deposit, what  
23 institution made that?

24 A. That was -- that was \$8,000 that one of  
25 Ms. Yang's associates here directly deposited into our

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1 account. So I don't have a copy of a check or

2 anything. Just that deposit slip.

3 Q. Do you know the name of the person that  
4 made the deposit?

5 A. I do not, no.

6 Q. Do you know if the bank knows, is there a  
7 record?

8 A. I don't know, possibly.

9 Q. Okay. Which account was it at your firm,  
10 was it the operating account or the client trust  
11 account?

12 A. I believe it was the trust account.

13 Q. Okay. Do you have access to that deposit  
14 record?

15 A. I do not. Just that slip.

16 Q. Just that slip?

17 A. Yeah.

18 Q. That's the only thing you have?

19 A. Yeah. I don't even have the actual slip.  
20 That was a copy of the slip that was transmitted to me.

21 Q. How about for the 7,000 direct deposit. Do  
22 you know what institution made that?

23 A. I do not know.

24 Q. Okay. Was it the same circumstance, the  
25 deposit was simply made?

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1 A. Yes.

2 Q. With respect to the secured loan  
3 agreements, are you aware of any other signed secured  
4 loan agreements other than the two you have produced to  
5 us?

6 A. No, I'm not.

7 Q. Are you aware of any other unsigned secured  
8 loan agreements?

9 A. No.

10 Q. Do you know whether or not Ms. Yang has  
11 entered into any other secured loan agreements since  
12 the SEC filed its lawsuit against her?

13 A. Not that I know of.

14 Q. How about any other loan agreements that  
15 she has entered into ever since the SEC signed -- filed  
16 this action against her?

17 A. None that I'm aware.

18 Q. What is the name of the sister that is also  
19 residing at the Driscoll Road property?

20 A. I don't know. It's a Chinese name. It was  
21 mentioned to me once, but I didn't really take note of  
22 it.

23 Q. Okay. And then you say her mother is  
24 there?

25 A. Her mother is there, yes.

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1 Q. Okay. Anybody else that you know of  
2 resides there?

3 A. Yes. There is a non-family member there,  
4 but I'm not sure who it is.

5 Q. Okay. Do you know --

6 A. Oh, her sister's children are there, too.  
7 And then there is a non-family member. And I'm not  
8 sure who that person is.

9 Q. Okay. Do you know who, if anyone, is  
10 making the mortgage payments to CitiMortgage?

11 A. I don't know. My belief is that it was  
12 Ms. Yang's sister who is living there. But I don't  
13 know for sure. I know they are being made, though.

14 Q. Okay. And that same person would also be  
15 making the insurance, mortgage, other necessary  
16 payments to maintain that property?

17 A. Insurance, yes. They may be behind in  
18 taxes.

19 MR. YUN: All right. Okay. Those are my  
20 questions. Thank you.

21 MS. SCOTT: I have a few more. I know  
22 we're right at 12. But I should be done in about five  
23 minutes, if that long.

24 FURTHER EXAMINATION BY MS. SCOTT

25 Q. You mentioned that -- well, when Mr. Jones

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1 was questioning you, you mentioned that the source of  
2 the wire funds of the \$500,000 from the secured loan  
3 agreement was wired into your account, correct?

4 A. Correct.

5 Q. Your firm's account?

6 A. Yes.

7 Q. And would you obtain copies of that for me?  
8 I believe you had mentioned that you would do so in a  
9 prior email, of the wire transaction?

10 A. I've never seen one. That's just the  
11 thing. Normally when there is a wire transfer into  
12 your account the bank sends you a written notification  
13 that there has been a wire. But I've actually never  
14 seen it. I can look for it again, but I'm not sure why  
15 we don't have one.

16 Q. Right. And aside for the funds received  
17 from the \$50,000 secured loan agreement as well?

18 A. Yes.

19 Q. Thank you.

20 A. Now I think that the 38,000 --

21 Q. It was a 30,000 -- well, must have been  
22 some kind of wire transfer fee, which reduced it by  
23 maybe --

24 A. \$20.

25 Q. And then there was an \$8,000 deposit. So



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1 that's 38,000.

2 A. Yes.

3 Q. So of that 50,000 loan there was only  
4 38,000 of it that you received?

5 A. And additional 7,000, too, I believe.

6 Q. Okay. I didn't get that information.  
7 Would you provide that information to me as well, if  
8 you are able to find it?

9 A. I'll look for it, yeah.

10 Q. Okay. Thank you. Do you consider a loan  
11 to be an asset?

12 MR. JONES: Objection, form.

13 THE WITNESS: Do I consider a loan to be an  
14 asset? I consider a loan to be an asset if you are the  
15 lender, but it's a liability if you are the borrower,  
16 yeah.

17 Q. (BY MS. SCOTT) Okay. The check that was  
18 sent to the County of Alameda Sheriff's Office included  
19 an amount that was obtained from the Sheriff's Office,  
20 correct?

21 A. The cashier's check amount was the amount  
22 that the Sheriff told me was necessary to pay the  
23 judgment. That amount came from the Sheriff, yes.

24 Q. Do you know if it included fees and costs  
25 to the county, the Sheriff's Office?

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1 A. Yes, it did.

2 MS. SCOTT: Okay. I don't have anything  
3 else. Oh, let me ask you this.

4 Q. (BY MS. SCOTT) Do you know if there are  
5 any agreements between Ms. You and Ms. Yang regarding  
6 this proceeding, other than the ones we've discussed  
7 here today?

8 A. I do not know. But I'm reasonably sure  
9 that there are not, because they have not been on  
10 speaking terms for a long time. All communications  
11 have been through counsel.

12 MS. SCOTT: Okay. I don't have any other  
13 questions at this time.

14 MR. YUN: I have one follow-up question.  
15 Did you want to go forward, Brandon?

16 MR. JONES: No, I'm good. Go ahead.

17 FURTHER EXAMINATION BY MR. YUN

18 Q. Very quickly. In terms of the lien that  
19 Mr. Jun Yang has against the Driscoll Road house, did  
20 you help in any way in the negotiation or drafting of  
21 that documentation?

22 A. I prepared the deed of trust for Ms. Yang.  
23 But what happened with that deed of trust after I  
24 prepared it I'm not sure. I don't know. I wasn't  
25 involved in having Jun Yang sign it. In fact I'm not

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CERTIFICATE OF REPORTER

I, DIANE M. WINTER, a Certified Shorthand Reporter, hereby certify that the witness in the foregoing deposition was by me duly sworn to tell the truth, the whole truth, and nothing but the truth in the within-entitled cause;

That said deposition was taken in shorthand by me, a disinterested person, at the time and place therein stated, and that the testimony of the said witness was thereafter reduced to typewriting, by computer, under my direction and supervision.

I further certify that I am not of counsel or attorney for either or any of the parties to the said deposition, nor in any way interested in the event of this cause, and that I am not related to any of the parties thereto.

DATED: July 12, 2017



DIANE M. WINTER, CSR No. 3186

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